

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

LG.PHILIPS LCD CO., LTD.,

Plaintiff,

v.

CHI MEI OPTOELECTRONICS  
CORPORATION, et al.

Defendants.

Civil Action No. 06-726 (JJF)  
Civil Action No. 07-357 (JJF)

**CONSOLIDATED CASES**

**STIPULATION AND ORDER RE: ISSUING LETTERS OF REQUEST**

THE PARTIES HERETO STIPULATE AND AGREE, subject to the approval of the Court, that Letters of Request, in the form of the attached Exhibits 1-6, be issued by the Court to the Appropriate Judicial Authorities of China, Taiwan, and Japan, seeking information from the foreign companies identified below by stipulation.

1. Letters of Request, in the attached hereto as Exhibits 1-6, shall be issued on behalf of LG Display Co., Ltd. to the following companies and the corresponding judicial authorities: Techview International Technology, Inc.; Quanta Computer, Inc.; and Qisda Corporation (Exhibit 1); Compal Electronics, Inc.; Delta Electronics, Inc.; Wistron Corporation; Jean Company; and Lite-On Technology Corporation (Exhibit 2); Proview Electronics Co., Ltd.; and AmTran Technology Co., Ltd. (Exhibit 3); Acer, Inc.; Hon Hai Precision Industry Co., Ltd.; Foxconn Technology Co., Ltd.; and Pro Arch Technology, Inc.(Exhibit 4); Funai Electric Co., Ltd.; Sharp Corporation; Sony Corporation; and Toshiba Corporation (Exhibit 5); and Delta Electronics Co., Ltd.; Proview Technology Co., Ltd.; and Top Victory Electronics Co., Ltd. (Exhibit 6).

2. The parties reserve all rights and objections concerning information provided by any third party in response to any Letter of Request, including objections to any documents offered into evidence at trial.

3. Upon the Court's approval, each of the Letters of Request (Exhibits 1-6) shall be issued by the Court with the Court's signature and seal, and provided to counsel for translation and forwarding to the appropriate judicial authority.

June 11, 2008

BAYARD, P.A.

OF COUNSEL:

Gaspare J. Bono  
R. Tyler Goodwyn, IV  
Lora A. Brzezynski  
Cass W. Christenson  
McKenna Long & Aldridge LLP  
1900 K Street, N.W.  
Washington, D.C. 20006  
(202) 496-7500

/s/ Richard D. Kirk (rk0922)  
Richard D. Kirk  
Ashley B. Stitzer  
222 Delaware Avenue, 9th Floor  
P.O. Box 25130  
Wilmington, DE 19899-5130  
(302) 655-5000  
rkirk@bayardfirm.com

*Attorneys for LG Display Co., Ltd. and LG Display America, Inc.*

OF COUNSEL:

Jonathan Kagan  
Alexandar C.D. Giza  
Adam Hoffman  
Irell & Manella LLP  
1800 Avenue of the Stars, Suite 900  
Los Angeles, CA 90067  
(310) 203-7092

POTTER ANDERSON & CORROON, LLP

/s/ Philip A. Rovner (pr 3215)  
Philip A. Rovner  
Potter Anderson & Corroon LLP  
Hercules Plaza  
P.O. Box 951  
Wilmington, DE 19899  
(302) 984-6000  
provner@potteranderson.com

*Attorneys for Chi Mei Optoelectronics Corporation and Chi Mei Optoelectronics USA, Inc.*

OF COUNSEL:

Vincent K. Yip  
Peter J. Wied  
Terry Garnett  
Katherine Murray  
Paul Hastings, Janofsky & Walker LLP  
515 South Flower Street, 25th Floor  
Los Angeles, CA 90071  
(213) 683-6000

M. Craig Tyler  
Brian D. Range  
Wilson Sonsini Goodrich & Rosati  
8911 Capital of Texas Highway North  
Westech 360, Suite 3350  
Austin, TX 78759-8497  
(512) 338-5400

Julie Holloway, Esquire  
Wilson Sonsini Goodrich & Rosati  
650 Page Mill Road  
Palo Alto, CA 94304-1050

YOUNG CONAWAY STARGATT & TAYLOR, LLP

/s/ Karen L. Pascale (kp2903)

Karen L. Pascale  
John W. Shaw  
Young Conaway Stargatt & Taylor, LLP  
The Brandywine Building  
1000 West Street, 17th Floor  
P.O. Box 391  
Wilmington, DE 19899-0391  
(301) 571-6600  
kpascale@ycst.com

*Attorneys for AU Optronics Corporation and AU  
Optronics Corporation America*

SO ORDERED this \_\_\_\_ day of June, 2008.

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United States District Judge

## EXHIBIT 1

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

LG DISPLAY CO., LTD.,

Plaintiff,

v.

CHI MEI OPTOELECTRONICS  
CORPORATION, et al.

Defendants.

Civil Action No. 06-726 (JJF)

Civil Action No. 07-357 (JJF)

**CONSOLIDATED CASES**

**LETTER OF REQUEST FOR INTERNATIONAL JUDICIAL ASSISTANCE  
FROM THE APPROPRIATE JUDICIAL AUTHORITY IN TAOYUAN, TAIWAN**

TO THE APPROPRIATE JUDICIAL AUTHORITY OF TAOYUAN, TAIWAN:

The United States District Court for the District of Delaware presents its compliments, and requests International Judicial Assistance to permit the Plaintiff in the above-captioned civil matter to take the deposition of and request the production of documents from the entities named herein.

This Court requests the assistance described herein as necessary in the interests of justice. The assistance requested is that the Appropriate Judicial Authority of Taoyuan, Taiwan compels the following entities to provide testimony upon oral examination relating to the questions in attached Schedule A and to provide the production of documents requested in attached Schedule B:

1. Techview International Technology Inc.  
2F, 188, Wen Hwa 2nd Rd.  
Kuei Shan Hsiang, Tao Yuan Shien, Taiwan

2. Quanta Computer Inc.  
No. 211, Wen Hwa 2nd Rd.  
Kuei Shan Hsiang, Tao Yuan Shein, Taiwan
3. Qisda Corporation  
157 Shan-ying Road, Gueishan  
Taoyuan 333, Taiwan, R.O.C

Collectively, these companies are referred to herein as the "LCD Product Manufacturers".

The above-captioned lawsuit is an action by Plaintiff LG Display Co., Ltd. ("LG Display"), a corporation existing under the laws of Korea, against Defendants that include AU Optronics Corporation ("AUO") and Chi Mei Optoelectronics Corporation ("CMO"), both corporations existing under the laws of Taiwan. This Court properly has jurisdiction of all the parties and the subject matter of this action.

LG Display sued AUO and CMO for infringement of United States Patent Nos. 5,019,002 (the "'002 patent"), 5,825,449 (the "'449 patent"), 4,624,737 (the "'737 patent"), 5,905,274 (the "'274 patent"), 6,815,321 (the "'321 patent"), 7,176,489 (the "'489 patent"), 6,664,569 (the "'569 patent"), 7,218,374 (the "'374 patent"), and 6,803,984 (the "'984 patent") (collectively, "the Patents-in-Suit"), which cover various aspects of liquid crystal display ("LCD") technology. LG Display alleges that AUO and CMO make and sell certain LCD modules that infringe the various claims of the Patents-in-Suit. LG Display also alleges that Quanta Display, Inc. ("QDI") made and sold certain LCD modules that infringe the various claims of the Patents-in-Suit. QDI merged into AUO, and AUO is now responsible for any infringement by QDI products.

LG Display alleges that AUO and CMO manufacture infringing LCD modules in Taiwan, and that AUO and CMO sell and supply those allegedly infringing modules to LCD Product Manufacturers located in Taiwan and elsewhere for use in making LCD products such as

televisions, laptop computers and computer monitors. The LCD Product Manufacturers sell and supply such display products containing the allegedly infringing AUO and CMO LCD modules to companies and brands that import and sell those products in the United States. LG Display believes that AUO and CMO sell modules directly to LCD Product Manufacturers and other customers. In addition, LG Display believes that AUO and CMO ship to LCD Product Manufacturers modules that AUO and CMO sell to customers whose LCD products are made or supplied by the LCD Product Manufacturers, using infringing AUO modules and CMO modules.

LG Display seeks information from the LCD Product Manufacturers regarding their use and purchase of AUO's, CMO's, and QDI's LCD products. Information sought by LG Display, for example, includes the quantities and model numbers of AUO, CMO, and QDI products purchased by the LCD Product Manufacturers, which brands and model numbers of finished LCD products use AUO's, CMO's, and QDI's products, and the sale and distribution of these products, including into and for the United States market. LG Display thus seeks to depose the LCD Product Manufacturers regarding the questions listed in the attached Schedule A. LG Display also seeks to obtain from the LCD Product Manufacturers the documents and things listed in the attached Schedule B.

By compelling the LCD Product Manufacturers to answer the questions listed in attached Schedule A and to produce the documents and things listed in attached Schedule B, the Appropriate Judicial Authority of Taiwan will allow LG Display to obtain necessary and material evidence for use at trial concerning issues including whether AUO and CMO induce infringement of the Patents-in-Suit and the amount of damages that should be awarded to LG Display regarding any direct and/or indirect infringement.

It is requested that the witnesses be placed under oath before answering the questions. In the event that the witnesses cannot be placed under oath, it is requested that they answer questions in such manner as provided by local law for taking evidence.

It is also requested: a) that the responses of the witnesses be recorded by verbatim stenography or, if this is not possible, that LG Display be allowed to bring a court reporter to the examination of the witnesses in order to keep such verbatim minutes; b) that the witnesses sign the verbatim transcript or other record of their responses to the questions; and c) that the Court take all available measures to protect the confidentiality of information obtained during the testimony.

It is further requested that the Court, if possible, request the witnesses send the documents requested in Schedule B to LG Display's United States trial counsel at McKenna Long & Aldridge LLP, Attn: Cass W. Christenson, 1900 K Street NW, Washington, DC 20006, as soon as possible.

It is also requested, given the importance of the evidence to be obtained, that these Requests be given the highest consideration. To the extent that any of these Requests cannot be granted, the execution of these Requests shall be performed according to applicable law and the fact that some part or parts of this request can not be granted should not affect the execution of the remaining parts.

It is requested that the parties' U.S. legal representatives identified above be informed as soon as practicable of the date and place where the examination is to take place. It is further requested that, if possible, notice should be furnished to these legal representatives at least 15 days before the date set for the examination.



Any privilege to refuse to give evidence under United States law is contained in the United States Federal Rules of Civil Procedure ("FRCP"), Federal Rules of Evidence and other applicable United States laws. Specifically, the witness must answer all questions unless the witness is directed by counsel not to answer the question. Such an instruction is appropriate only when necessary to preserve a privilege, to enforce a limitation directed by the court, or to support a motion to cease testimony due to harassment of the witness. See FRCP 30(d)(1).

This Court respectfully requests that the Appropriate Judicial Authority in Taoyuan, Taiwan provide the foregoing judicial assistance. In addition, and in return for the favor of such judicial assistance by the Appropriate Judicial Authority in Taoyuan, Taiwan with respect to this matter, this Court offers its future assistance which may be hereafter required in the District of Delaware by the Appropriate Judicial Authority of Taoyuan, Taiwan.

Fees and costs incurred by the Taiwanese authorities executing this Letter of Request will be borne by Plaintiff LG Display. A check payable to the American Institute in Taiwan is enclosed to cover fees of the Appropriate Judicial Authority in Taoyuan, Taiwan.

Dated: June \_\_\_\_, 2008

Respectfully requested,

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The Honorable Joseph J. Farnan  
United States District Judge  
United States District Court for the  
District of Delaware  
J. Caleb Boggs Federal Bldg  
844 North King Street  
Wilmington, DE 19801-3519

**Judicial Seal:**

**SCHEDULE A**

**QUESTIONS TO BE ASKED THE WITNESSES AT DEPOSITION**

1. Did you have, or do you have, any strategic alliances with:

- (a) AU Optronics Corporation?
- (b) Chi Mei Optoelectronics Corporation?
- (c) Quanta Display, Inc.?

If so, please describe the nature of the alliance and when that alliance first began.

2. For each year since 2000, what percentage of your products use:

- (a) AU Optronics Corporation modules?
- (b) Chi Mei Optoelectronics Corporation modules?
- (c) Quanta Display, Inc. modules?

3. For each year since 2000, which of your models use which modules supplied by:

- (a) AU Optronics Corporation?
- (b) Chi Mei Optoelectronics Corporation?
- (c) Quanta Display, Inc.?

4. Are your products that use the modules from the following companies supplied in

whole or part for the United States?

- (a) AU Optronics Corporation?
- (b) Chi Mei Optoelectronics Corporation?
- (c) Quanta Display, Inc.?

5. For each year since 2000, which of your customers purchased products using

LCD modules from the following suppliers:

- (a) AU Optronics Corporation?
- (b) Chi Mei Optoelectronics Corporation?

(c) Quanta Display, Inc.?

6. For each year since 2000, did your products using LCD modules from the following companies comply with any requirements and regulations that apply to imports or sales in the United States:

(a) AU Optronics Corporation?

(b) Chi Mei Optoelectronics Corporation?

(c) Quanta Display, Inc.?

7. Which brands and models of LCD products did your company supply or manufacture for sale in the United States, in whole or in part, including the number of such units sold and the price per unit, each year since December 1, 2000?

8. What was the annual revenue received by your company from the sales of LCD products in each year from 2000 to 2007?

9. Since December 1, 2000, what models of LCD modules have you purchased and/or received from:

(a) AU Optronics Corporation?

(b) Chi Mei Optoelectronics Corporation?

(c) Quanta Display, Inc.?

10. Since December 1, 2000, which LCD modules manufactured or sold by the following companies were used in each of the different brands and models of products manufactured and sold by your company:

(a) AU Optronics Corporation?

(b) Chi Mei Optoelectronics Corporation?

(c) Quanta Display, Inc.?

11. For each product model made or sold by your company, how many of your products and units used?
- (a) AU Optronics Corporation modules?
  - (b) Chi Mei Optoelectronics Corporation modules?
  - (c) Quanta Display, Inc. modules?
12. For each year since 2000, how many of each model of LCD module has your company purchased or received from:
- (a) AU Optronics Corporation?
  - (b) Chi Mei Optoelectronics Corporation?
  - (c) Quanta Display, Inc.?
13. For each year since 2000, what was the price paid, including the unit price and net price after any discounts or rebates, for each model of LCD module purchased or received from:
- (a) AU Optronics Corporation?
  - (b) Chi Mei Optoelectronics Corporation?
  - (c) Quanta Display, Inc.?
14. For each year since December 1, 2000, how many of each brand and model of LCD product you shipped and sold used or could have used modules from:
- (a) AU Optronics Corporation?
  - (b) Chi Mei Optoelectronics Corporation?
  - (c) Quanta Display, Inc.?
15. For each year since December 1, 2000, what was the destination of each brand and model of LCD product you shipped and sold that used or could have used modules from:
- (a) AU Optronics Corporation?
  - (b) Chi Mei Optoelectronics Corporation?

(c) Quanta Display, Inc.?

16. Identify each brand and customer that has imported and/or sold in the United States LCD products made or supplied by your company since December 1, 2000?

17. What price did your company sell each brand and model of LCD product to its customers that sell LCD products in the United States, for each year since December 1, 2000?

18. What was the annual volume of sales made by your company to each customer that sells LCD products in the United States, including the quantity of each model sold or supplied to or for each customer, each year since December 1, 2000?

19. What was the annual revenue generated from sales made by your company to brands and customers that sell LCD products in the United States, for each model of your products, each year since December 1, 2000?

**SCHEDULE B**

**LIST OF THE DOCUMENTS AND THINGS TO BE PRODUCED**

1. Documents showing the different models of LCD products sold by your company since December 1, 2000.
2. Documents showing the unit sales of each different brand and model of LCD product sold by your company since December 1, 2000, including the number of units sold and the price per unit.
3. Documents showing which brands and models of LCD products were manufactured for sale in the United States, in whole or in part, including the number of such units sold and the price per unit, each year since December 1, 2000.
4. Documents showing the annual revenue received by your company from the sales of LCD products from 2000 to 2007.
5. Documents showing the models of LCD modules purchased and/or received, since December 1, 2000 from:
  - (a) AU Optronics Corporation?
  - (b) Chi Mei Optoelectronics Corporation?
  - (c) Quanta Display, Inc.?
6. Documents showing which AU Optronics Corporation modules were used in each of the different brands and models of products manufactured and sold by your company since December 1, 2000, and the quantity of each AU Optronics Corporation module used for each product model made or sold by your company.
7. Documents showing which Chi Mei Optoelectronics Corporation modules were used in each of the different brands and models of products manufactured and sold by your

company since December 1, 2000, and the quantity of each Chi Mei Optoelectronics Corporation module used for each product model made or sold by your company.

8. Documents showing which Quanta Display, Inc. modules were used in each of the different brands and models of products manufactured and sold by your company since December 1, 2000, and the quantity of each Quanta Display, Inc. module used for each product model made or sold by your company.

9. Documents showing, since December 1, 2000 how many of each model of LCD module your company purchased or received, on an annual basis, from

- (a) AU Optronics Corporation?
- (b) Chi Mei Optoelectronics Corporation?
- (c) Quanta Display, Inc.?

10. Documents showing, on an annual basis since December 1, 2000, the price paid, including the unit price and net price after any discounts or rebates, for each model of LCD module purchased or received from:

- (a) AU Optronics Corporation?
- (b) Chi Mei Optoelectronics Corporation?
- (c) Quanta Display, Inc.?

11. Documents showing, on an annual basis since December 1, 2000, how many of each brand and model of LCD product you shipped and sold that used or could have used AUO modules from:

- (a) AU Optronics Corporation?
- (b) Chi Mei Optoelectronics Corporation?
- (c) Quanta Display, Inc.?

12. Documents showing, since December 1, 2000, the destination of each brand and model of LCD product you shipped and sold that used or could have used modules from:

- (a) AU Optronics Corporation?
- (b) Chi Mei Optoelectronics Corporation?
- (c) Quanta Display, Inc.?

13. Documents showing how many LCD modules your company has purchased from suppliers other than AU Optronics Corporation, Chi Mei Optoelectronics Corporation, or Quanta Display, Inc. on an annual basis since December 1, 2000.

14. Documents showing the percentage of LCD modules that your company has purchased from each of its suppliers on an annual basis since December 1, 2000.

15. Documents showing the identity of brands and customers that sell or sold in the United States LCD products made or sold by your company since December 1, 2000.

16. Documents showing the price at which your company sold each brand and model of LCD product to its customers that sell LCD products in the United States, for each year since December 1, 2000.

17. Documents showing the annual volume of sales made by your company to each customer that sells LCD products in the United States, including the quantity of each model sold or supplied to or for each customer, since December 1, 2000.

18. Documents showing the annual revenue generated from sales made by your company to brands and customers that sell LCD products in the United States, for each model of your products, since December 1, 2000.



## EXHIBIT 2

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

LG DISPLAY CO., LTD.,

Plaintiff,

v.

CHI MEI OPTOELECTRONICS  
CORPORATION, et al.

Defendants.

Civil Action No. 06-726 (JJF)

Civil Action No. 07-357 (JJF)

**CONSOLIDATED CASES**

**LETTER OF REQUEST FOR INTERNATIONAL JUDICIAL ASSISTANCE  
FROM THE APPROPRIATE JUDICIAL AUTHORITY IN SHIN-LIN, TAIWAN**

TO THE APPROPRIATE JUDICIAL AUTHORITY OF SHIN-LIN, TAIWAN:

The United States District Court for the District of Delaware presents its compliments, and requests International Judicial Assistance to permit the Plaintiff in the above-captioned civil matter to take the deposition of and request the production of documents from the entities named herein.

This Court requests the assistance described herein as necessary in the interests of justice. The assistance requested is that the Appropriate Judicial Authority of Shin-lin, Taiwan compel the following entities to provide testimony upon oral examination relating to the questions in attached Schedule A and to provide the production of documents requested in attached Schedule B:

1. Compal Electronics  
No. 581, Ruiguang Rd., Neihu District  
Taipei City 11492, Taiwan

2. Delta Electronics, Inc.  
186 Ruey Kuang Road, Neihu  
Taipei 114, Taiwan
3. Wistron Corporation  
21 F. 88, Sec. 1, Hsin Tai Wu Road, Hsichih  
Taipei Hsien 221, Taiwan
4. Jean Co., Ltd.  
7 F, 2, Rei Kuang Road, Neihu  
Taipei, Taiwan
5. Lite-On Technology Corp.  
22 F, 392 Ruey Kuang Road  
Neihu, Taipei 114, Taiwan

Collectively, these companies are referred to herein as the “LCD Product Manufacturers”.

The above-captioned lawsuit is an action by Plaintiff LG Display Co., Ltd. (“LG Display”), a corporation existing under the laws of Korea, against Defendants that include AU Optronics Corporation (“AUO”) and Chi Mei Optoelectronics Corporation (“CMO”), both corporations existing under the laws of Taiwan. This Court properly has jurisdiction of all the parties and the subject matter of this action.

LG Display sued AUO and CMO for infringement of United States Patent Nos. 5,019,002 (the “‘002 patent”), 5,825,449 (the “‘449 patent”), 4,624,737 (the “‘737 patent”), 5,905,274 (the “‘274 patent”), 6,815,321 (the “‘321 patent”), 7,176,489 (the “‘489 patent”), 6,664,569 (the “‘569 patent”), 7,218,374 (the “‘374 patent”), and 6,803,984 (the “‘984 patent”) (collectively, “the Patents-in-Suit”), which cover various aspects of liquid crystal display (“LCD”) technology. LG Display alleges that AUO and CMO make and sell certain LCD modules that infringe the various claims of the Patents-in-Suit. LG Display also alleges that Quanta Display, Inc. (“QDI”) made and sold certain LCD modules that infringe the various

claims of the Patents-in-Suit. QDI merged into AUO, and AUO is now responsible for any infringement by QDI products.

LG Display alleges that AUO and CMO manufacture infringing LCD modules in Taiwan, and that AUO and CMO sell and supply those allegedly infringing modules to LCD Product Manufacturers located in Taiwan and elsewhere for use in making LCD products such as televisions, laptop computers and computer monitors. The LCD Product Manufacturers sell and supply such display products containing the allegedly infringing AUO and CMO LCD modules to companies and brands that import and sell those products in the United States. LG Display believes that AUO and CMO sell modules directly to LCD Product Manufacturers and other customers. In addition, LG Display believes that AUO and CMO ship to LCD Product Manufacturers modules that AUO and CMO sell to customers whose LCD products are made or supplied by the LCD Product Manufacturers, using infringing AUO modules and CMO modules.

LG Display seeks information from the LCD Product Manufacturers regarding their use and purchase of AUO's, CMO's, and QDI's LCD products. Information sought by LG Display, for example, includes the quantities and model numbers of AUO, CMO, and QDI products purchased by the LCD Product Manufacturers, which brands and model numbers of finished LCD products use AUO's, CMO's, and QDI's products, and the sale and distribution of these products, including into and for the United States market. LG Display thus seeks to depose the LCD Product Manufacturers regarding the questions listed in the attached Schedule A. LG Display also seeks to obtain from the LCD Product Manufacturers the documents and things listed in the attached Schedule B.

By compelling the LCD Product Manufacturers to answer the questions listed in attached Schedule A and to produce the documents and things listed in attached Schedule B, the

Appropriate Judicial Authority of Taiwan will allow LG Display to obtain necessary and material evidence for use at trial concerning issues including whether AUO and CMO induce infringement of the Patents-in-Suit and the amount of damages that should be awarded to LG Display regarding any direct and/or indirect infringement.

It is requested that the witnesses be placed under oath before answering the questions. In the event that the witnesses cannot be placed under oath, it is requested that they answer questions in such manner as provided by local law for taking evidence.

It is also requested: a) that the responses of the witnesses be recorded by verbatim stenography or, if this is not possible, that LG Display is allowed to bring a court reporter to the examination of the witnesses in order to keep such verbatim minutes; b) that the witnesses sign the verbatim transcript or other record of their responses to the questions; and c) that the Court shall take all available measures to protect the confidentiality of the information obtained during the testimony.

It is further requested that the Court, if possible, request the witnesses to send the documents requested in Schedule B to LG Display's United States trial counsel at McKenna Long & Aldridge LLP, Attn: Cass W. Christenson, 1900 K Street NW, Washington, DC 20006, as soon as possible.

It is also requested, given the importance of the evidence to be obtained, that these Requests be given the highest consideration. To the extent that any of these Requests cannot be granted, the execution of these Requests shall be performed according to applicable law and the fact that some part or parts of this request can not be granted should not affect the execution of the remaining parts.

It is further requested that the parties' U.S. legal representatives identified above be informed as soon as practicable of the date and place where the examination is to take place. It is further requested that, if possible, notice should be furnished to these legal representatives at least 15 days before the date set for the examination.

Any privilege to refuse to give evidence under United States law is contained in the United States Federal Rules of Civil Procedure ("FRCP"), Federal Rules of Evidence and other applicable United States laws. Specifically, the witness must answer all questions unless the witness is directed by counsel not to answer the question. Such an instruction is appropriate only when necessary to preserve a privilege, to enforce a limitation directed by the court, or to support a motion to cease testimony due to harassment of the witness. See FRCP 30(d)(1).

This Court respectfully requests that the Appropriate Judicial Authority in Shin-lin, Taiwan provide the foregoing judicial assistance. In addition, and in return for the favor of such judicial assistance by the Appropriate Judicial Authority in Shin-lin, Taiwan with respect to this matter, this Court offers its future assistance which may be hereafter required in the District of Delaware by the Appropriate Judicial Authority of Shin-lin, Taiwan.

Fees and costs incurred by the Taiwanese authorities executing this Letter of Request will be borne by Plaintiff LG Display. A check payable to the American Institute in Taiwan is enclosed to cover fees of the Appropriate Judicial Authority in Shin-lin, Taiwan.

Dated: June \_\_\_\_, 2008

Respectfully requested,

---

The Honorable Joseph J. Farnan  
United States District Judge  
United States District Court for the

District of Delaware  
J. Caleb Boggs Federal Bldg  
844 North King Street  
Wilmington, DE 19801-3519

**Judicial Seal:**

**SCHEDULE A**

**QUESTIONS TO BE ASKED THE WITNESSES AT DEPOSITION**

1. Did you have, or do you have, any strategic alliances with:

- (a) AU Optronics Corporation?
- (b) Chi Mei Optoelectronics Corporation?
- (c) Quanta Display, Inc.?

If so, please describe the nature of the alliance and when that alliance first began.

2. For each year since 2000, what percentage of your products use:

- (a) AU Optronics Corporation modules?
- (b) Chi Mei Optoelectronics Corporation modules?
- (c) Quanta Display, Inc. modules?

3. For each year since 2000, which of your models use which modules supplied by:

- (a) AU Optronics Corporation?
- (b) Chi Mei Optoelectronics Corporation?
- (c) Quanta Display, Inc.?

4. Are your products that use the modules from the following companies supplied in whole or part for the United States?

- (a) AU Optronics Corporation?
- (b) Chi Mei Optoelectronics Corporation?
- (c) Quanta Display, Inc.?

5. For each year since 2000, which of your customers purchased products using LCD modules from the following suppliers:

- (a) AU Optronics Corporation?
- (b) Chi Mei Optoelectronics Corporation?



(c) Quanta Display, Inc.?

6. For each year since 2000, did your products using LCD modules from the following companies comply with any requirements and regulations that apply to imports or sales in the United States:

(a) AU Optronics Corporation?

(b) Chi Mei Optoelectronics Corporation?

(c) Quanta Display, Inc.?

7. Which brands and models of LCD products did your company supply or manufacture for sale in the United States, in whole or in part, including the number of such units sold and the price per unit, each year since December 1, 2000?

8. What was the annual revenue received by your company from the sales of LCD products in each year from 2000 to 2007?

9. Since December 1, 2000, what models of LCD modules have you purchased and/or received from:

(a) AU Optronics Corporation?

(b) Chi Mei Optoelectronics Corporation?

(c) Quanta Display, Inc.?

10. Since December 1, 2000, which LCD modules manufactured or sold by the following companies were used in each of the different brands and models of products manufactured and sold by your company:

(a) AU Optronics Corporation?

(b) Chi Mei Optoelectronics Corporation?

(c) Quanta Display, Inc.?

11. For each product model made or sold by your company, how many of your products and units used?

- (a) AU Optronics Corporation modules?
- (b) Chi Mei Optoelectronics Corporation modules?
- (c) Quanta Display, Inc. modules?

12. For each year since 2000, how many of each model of LCD module has your company purchased or received from:

- (a) AU Optronics Corporation?
- (b) Chi Mei Optoelectronics Corporation?
- (c) Quanta Display, Inc.?

13. For each year since 2000, what was the price paid, including the unit price and net price after any discounts or rebates, for each model of LCD module purchased or received from:

- (a) AU Optronics Corporation?
- (b) Chi Mei Optoelectronics Corporation?
- (c) Quanta Display, Inc.?

14. For each year since December 1, 2000, how many of each brand and model of LCD product you shipped and sold used or could have used modules from:

- (a) AU Optronics Corporation?
- (b) Chi Mei Optoelectronics Corporation?
- (c) Quanta Display, Inc.?

15. For each year since December 1, 2000, what was the destination of each brand and model of LCD product you shipped and sold that used or could have used modules from:

- (a) AU Optronics Corporation?
- (b) Chi Mei Optoelectronics Corporation?

(c) Quanta Display, Inc.?

16. Identify each brand and customer that has imported and/or sold in the United States LCD products made or supplied by your company since December 1, 2000?

17. What price did your company sell each brand and model of LCD product to its customers that sell LCD products in the United States, for each year since December 1, 2000?

18. What was the annual volume of sales made by your company to each customer that sells LCD products in the United States, including the quantity of each model sold or supplied to or for each customer, each year since December 1, 2000?

19. What was the annual revenue generated from sales made by your company to brands and customers that sell LCD products in the United States, for each model of your products, each year since December 1, 2000?

**SCHEDULE B**

**LIST OF THE DOCUMENTS AND THINGS TO BE PRODUCED**

1. Documents showing the different models of LCD products sold by your company since December 1, 2000.
2. Documents showing the unit sales of each different brand and model of LCD product sold by your company since December 1, 2000, including the number of units sold and the price per unit.
3. Documents showing which brands and models of LCD products were manufactured for sale in the United States, in whole or in part, including the number of such units sold and the price per unit, each year since December 1, 2000.
4. Documents showing the annual revenue received by your company from the sales of LCD products from 2000 to 2007.
5. Documents showing the models of LCD modules purchased and/or received, since December 1, 2000 from:
  - (a) AU Optronics Corporation?
  - (b) Chi Mei Optoelectronics Corporation?
  - (c) Quanta Display, Inc.?
6. Documents showing which AU Optronics Corporation modules were used in each of the different brands and models of products manufactured and sold by your company since December 1, 2000, and the quantity of each AU Optronics Corporation module used for each product model made or sold by your company.
7. Documents showing which Chi Mei Optoelectronics Corporation modules were used in each of the different brands and models of products manufactured and sold by your

company since December 1, 2000, and the quantity of each Chi Mei Optoelectronics Corporation module used for each product model made or sold by your company.

8. Documents showing which Quanta Display, Inc. modules were used in each of the different brands and models of products manufactured and sold by your company since December 1, 2000, and the quantity of each Quanta Display, Inc. module used for each product model made or sold by your company.

9. Documents showing, since December 1, 2000 how many of each model of LCD module your company purchased or received, on an annual basis, from

- (a) AU Optronics Corporation?
- (b) Chi Mei Optoelectronics Corporation?
- (c) Quanta Display, Inc.?

10. Documents showing, on an annual basis since December 1, 2000, the price paid, including the unit price and net price after any discounts or rebates, for each model of LCD module purchased or received from:

- (a) AU Optronics Corporation?
- (b) Chi Mei Optoelectronics Corporation?
- (c) Quanta Display, Inc.?

11. Documents showing, on an annual basis since December 1, 2000, how many of each brand and model of LCD product you shipped and sold that used or could have used AUO modules from:

- (a) AU Optronics Corporation?
- (b) Chi Mei Optoelectronics Corporation?
- (c) Quanta Display, Inc.?

12. Documents showing, since December 1, 2000, the destination of each brand and model of LCD product you shipped and sold that used or could have used modules from:

- (a) AU Optronics Corporation?
- (b) Chi Mei Optoelectronics Corporation?
- (c) Quanta Display, Inc.?

13. Documents showing how many LCD modules your company has purchased from suppliers other than AU Optronics Corporation, Chi Mei Optoelectronics Corporation, or Quanta Display, Inc. on an annual basis since December 1, 2000.

14. Documents showing the percentage of LCD modules that your company has purchased from each of its suppliers on an annual basis since December 1, 2000.

15. Documents showing the identity of brands and customers that sell or sold in the United States LCD products made or sold by your company since December 1, 2000.

16. Documents showing the price at which your company sold each brand and model of LCD product to its customers that sell LCD products in the United States, for each year since December 1, 2000.

17. Documents showing the annual volume of sales made by your company to each customer that sells LCD products in the United States, including the quantity of each model sold or supplied to or for each customer, since December 1, 2000.

18. Documents showing the annual revenue generated from sales made by your company to brands and customers that sell LCD products in the United States, for each model of your products, since December 1, 2000.

DC:50550196.1

## EXHIBIT 3

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

LG DISPLAY CO., LTD.,

Plaintiff,

v.

CHI MEI OPTOELECTRONICS  
CORPORATION, et al.

Defendants.

Civil Action No. 06-726 (JJF)

Civil Action No. 07-357 (JJF)

**CONSOLIDATED CASES**

**LETTER OF REQUEST FOR INTERNATIONAL JUDICIAL ASSISTANCE  
FROM THE APPROPRIATE JUDICIAL AUTHORITY IN PAN-CHIAO, TAIWAN**

TO THE APPROPRIATE JUDICIAL AUTHORITY OF PAN-CHIAO, TAIWAN:

The United States District Court for the District of Delaware presents its compliments, and requests International Judicial Assistance to permit the Plaintiff in the above-captioned civil matter to take the deposition of and request the production of documents from the entities named herein.

This Court requests the assistance described herein as necessary in the interests of justice. The assistance requested is that the Appropriate Judicial Authority of Pan-Chiao, Taiwan compel the following entities to provide testimony upon oral examination relating to the questions in attached Schedule A and to provide the production of documents requested in attached Schedule B:

1. Provview Electronics Co., Ltd.  
6F, No. 1 Pau-Shang Rd.  
Yung-Ho City, Taipei 234, Taiwan



2. AmTran Technology Co., Ltd.  
17 F, No. 268, Lien Chen Rd.  
Chung Ho City, Taipei Country, Taiwan

Collectively, these companies are referred to herein as the "LCD Product Manufacturers".

The above-captioned lawsuit is an action by Plaintiff LG Display Co., Ltd. ("LG Display"), a corporation existing under the laws of Korea, against Defendants that include AU Optronics Corporation ("AUO") and Chi Mei Optoelectronics Corporation ("CMO"), both corporations existing under the laws of Taiwan. This Court properly has jurisdiction of all the parties and the subject matter of this action.

LG Display sued AUO and CMO for infringement of United States Patent Nos. 5,019,002 (the "'002 patent"), 5,825,449 (the "'449 patent"), 4,624,737 (the "'737 patent"), 5,905,274 (the "'274 patent"), 6,815,321 (the "'321 patent"), 7,176,489 (the "'489 patent"), 6,664,569 (the "'569 patent"), 7,218,374 (the "'374 patent"), and 6,803,984 (the "'984 patent") (collectively, "the Patents-in-Suit"), which cover various aspects of liquid crystal display ("LCD") technology. LG Display alleges that AUO and CMO make and sell certain LCD modules that infringe the various claims of the Patents-in-Suit. LG Display also alleges that Quanta Display, Inc. ("QDI") made and sold certain LCD modules that infringe the various claims of the Patents-in-Suit. QDI merged into AUO, and AUO is now responsible for any infringement by QDI products.

LG Display alleges that AUO and CMO manufacture infringing LCD modules in Taiwan, and that AUO and CMO sell and supply those allegedly infringing modules to LCD Product Manufacturers located in Taiwan and elsewhere for use in making LCD products such as televisions, laptop computers and computer monitors. The LCD Product Manufacturers sell and supply such display products containing the allegedly infringing AUO and CMO LCD modules

to companies and brands that import and sell those products in the United States. LG Display believes that AUO and CMO sell modules directly to LCD Product Manufacturers and other customers. In addition, LG Display believes that AUO and CMO ship to LCD Product Manufacturers modules that AUO and CMO sell to customers whose LCD products are made or supplied by the LCD Product Manufacturers, using infringing AUO modules and CMO modules.

LG Display seeks information from the LCD Product Manufacturers regarding their use and purchase of AUO's, CMO's, and QDI's LCD products. Information sought by LG Display, for example, includes the quantities and model numbers of AUO, CMO, and QDI products purchased by the LCD Product Manufacturers, which brands and model numbers of finished LCD products use AUO's, CMO's, and QDI's products, and the sale and distribution of these products, including into and for the United States market. LG Display thus seeks to depose the LCD Product Manufacturers regarding the questions listed in the attached Schedule A. LG Display also seeks to obtain from the LCD Product Manufacturers the documents and things listed in the attached Schedule B.

By compelling the LCD Product Manufacturers to answer the questions listed in attached Schedule A and to produce the documents and things listed in attached Schedule B, the Appropriate Judicial Authority of Taiwan will allow LG Display to obtain necessary and material evidence for use at trial concerning issues including whether AUO and CMO induce infringement of the Patents-in-Suit and the amount of damages that should be awarded to LG Display regarding any direct and/or indirect infringement.

It is requested that the witnesses be placed under oath before answering the questions. In the event that the witnesses cannot be placed under oath, it is requested that they answer questions in such manner as provided by local law for taking evidence.

It is also requested: a) that the responses of the witnesses be recorded by verbatim stenography or, if this is not possible, that LG Display is allowed to bring a court reporter to the examination of the witnesses in order to keep such verbatim minutes; b) that the witnesses sign the verbatim transcript or other record of their responses to the questions; and c) that the Court shall take all available measures to protect the confidentiality of the information obtained during the testimony.

It is further requested that the Court, if possible, request the witnesses to send the documents requested in Schedule B to LG Display's United States trial counsel at McKenna Long & Aldridge LLP, Attn: Cass W. Christenson, 1900 K Street NW, Washington, DC 20006, as soon as possible.

It is also requested, given the importance of the evidence to be obtained, that these Requests be given the highest consideration. To the extent that any of these Requests cannot be granted, the execution of these Requests shall be performed according to applicable law and the fact that some part or parts of this request can not be granted should not affect the execution of the remaining parts.

It is further requested that the parties' U.S. legal representatives identified above be informed as soon as practicable of the date and place where the examination is to take place. It is further requested that, if possible, notice should be furnished to these legal representatives at least 15 days before the date set for the examination.

Any privilege to refuse to give evidence under United States law is contained in the United States Federal Rules of Civil Procedure ("FRCP"), Federal Rules of Evidence and other applicable United States laws. Specifically, the witness must answer all questions unless the witness is directed by counsel not to answer the question. Such an instruction is appropriate only

when necessary to preserve a privilege, to enforce a limitation directed by the court, or to support a motion to cease testimony due to harassment of the witness. See FRCP 30(d)(1).

This Court respectfully requests that the Appropriate Judicial Authority in Pan-Chiao, Taiwan provide the foregoing judicial assistance. In addition, and in return for the favor of such judicial assistance by the Appropriate Judicial Authority in Pan-Chiao, Taiwan with respect to this matter, this Court offers its future assistance which may be hereafter required in the District of Delaware by the Appropriate Judicial Authority of Pan-Chiao, Taiwan.

Fees and costs incurred by the Taiwanese authorities executing this Letter of Request will be borne by Plaintiff LG Display. A check payable to the American Institute in Taiwan is enclosed to cover fees of the Appropriate Judicial Authority in Pan-Chiao, Taiwan.

Dated: June \_\_\_\_, 2008

Respectfully requested,

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The Honorable Joseph J. Farnan  
United States District Judge  
United States District Court for the  
District of Delaware  
J. Caleb Boggs Federal Bldg  
844 North King Street  
Wilmington, DE 19801-3519

**Judicial Seal:**

**SCHEDULE A**

**QUESTIONS TO BE ASKED THE WITNESSES AT DEPOSITION**

1. Did you have, or do you have, any strategic alliances with:

- (a) AU Optronics Corporation?
- (b) Chi Mei Optoelectronics Corporation?
- (c) Quanta Display, Inc.?

If so, please describe the nature of the alliance and when that alliance first began.

2. For each year since 2000, what percentage of your products use:

- (a) AU Optronics Corporation modules?
- (b) Chi Mei Optoelectronics Corporation modules?
- (c) Quanta Display, Inc. modules?

3. For each year since 2000, which of your models use which modules supplied by:

- (a) AU Optronics Corporation?
- (b) Chi Mei Optoelectronics Corporation?
- (c) Quanta Display, Inc.?

4. Are your products that use the modules from the following companies supplied in whole or part for the United States?

- (a) AU Optronics Corporation?
- (b) Chi Mei Optoelectronics Corporation?
- (c) Quanta Display, Inc.?

5. For each year since 2000, which of your customers purchased products using LCD modules from the following suppliers:

- (a) AU Optronics Corporation?
- (b) Chi Mei Optoelectronics Corporation?

(c) Quanta Display, Inc.?

6. For each year since 2000, did your products using LCD modules from the following companies comply with any requirements and regulations that apply to imports or sales in the United States:

(a) AU Optronics Corporation?

(b) Chi Mei Optoelectronics Corporation?

(c) Quanta Display, Inc.?

7. Which brands and models of LCD products did your company supply or manufacture for sale in the United States, in whole or in part, including the number of such units sold and the price per unit, each year since December 1, 2000?

8. What was the annual revenue received by your company from the sales of LCD products in each year from 2000 to 2007?

9. Since December 1, 2000, what models of LCD modules have you purchased and/or received from:

(a) AU Optronics Corporation?

(b) Chi Mei Optoelectronics Corporation?

(c) Quanta Display, Inc.?

10. Since December 1, 2000, which LCD modules manufactured or sold by the following companies were used in each of the different brands and models of products manufactured and sold by your company:

(a) AU Optronics Corporation?

(b) Chi Mei Optoelectronics Corporation?

(c) Quanta Display, Inc.?

11. For each product model made or sold by your company, how many of your products and units used?
- (a) AU Optronics Corporation modules?
  - (b) Chi Mei Optoelectronics Corporation modules?
  - (c) Quanta Display, Inc. modules?
12. For each year since 2000, how many of each model of LCD module has your company purchased or received from:
- (a) AU Optronics Corporation?
  - (b) Chi Mei Optoelectronics Corporation?
  - (c) Quanta Display, Inc.?
13. For each year since 2000, what was the price paid, including the unit price and net price after any discounts or rebates, for each model of LCD module purchased or received from:
- (a) AU Optronics Corporation?
  - (b) Chi Mei Optoelectronics Corporation?
  - (c) Quanta Display, Inc.?
14. For each year since December 1, 2000, how many of each brand and model of LCD product you shipped and sold used or could have used modules from:
- (a) AU Optronics Corporation?
  - (b) Chi Mei Optoelectronics Corporation?
  - (c) Quanta Display, Inc.?
15. For each year since December 1, 2000, what was the destination of each brand and model of LCD product you shipped and sold that used or could have used modules from:
- (a) AU Optronics Corporation?
  - (b) Chi Mei Optoelectronics Corporation?

(c) Quanta Display, Inc.?

16. Identify each brand and customer that has imported and/or sold in the United States LCD products made or supplied by your company since December 1, 2000?

17. What price did your company sell each brand and model of LCD product to its customers that sell LCD products in the United States, for each year since December 1, 2000?

18. What was the annual volume of sales made by your company to each customer that sells LCD products in the United States, including the quantity of each model sold or supplied to or for each customer, each year since December 1, 2000?

19. What was the annual revenue generated from sales made by your company to brands and customers that sell LCD products in the United States, for each model of your products, each year since December 1, 2000?



**SCHEDULE B**

**LIST OF THE DOCUMENTS AND THINGS TO BE PRODUCED**

1. Documents showing the different models of LCD products sold by your company since December 1, 2000.
2. Documents showing the unit sales of each different brand and model of LCD product sold by your company since December 1, 2000, including the number of units sold and the price per unit.
3. Documents showing which brands and models of LCD products were manufactured for sale in the United States, in whole or in part, including the number of such units sold and the price per unit, each year since December 1, 2000.
4. Documents showing the annual revenue received by your company from the sales of LCD products from 2000 to 2007.
5. Documents showing the models of LCD modules purchased and/or received, since December 1, 2000 from:
  - (a) AU Optronics Corporation?
  - (b) Chi Mei Optoelectronics Corporation?
  - (c) Quanta Display, Inc.?
6. Documents showing which AU Optronics Corporation modules were used in each of the different brands and models of products manufactured and sold by your company since December 1, 2000, and the quantity of each AU Optronics Corporation module used for each product model made or sold by your company.
7. Documents showing which Chi Mei Optoelectronics Corporation modules were used in each of the different brands and models of products manufactured and sold by your

company since December 1, 2000, and the quantity of each Chi Mei Optoelectronics Corporation module used for each product model made or sold by your company.

8. Documents showing which Quanta Display, Inc. modules were used in each of the different brands and models of products manufactured and sold by your company since December 1, 2000, and the quantity of each Quanta Display, Inc. module used for each product model made or sold by your company.

9. Documents showing, since December 1, 2000 how many of each model of LCD module your company purchased or received, on an annual basis, from

- (a) AU Optronics Corporation?
- (b) Chi Mei Optoelectronics Corporation?
- (c) Quanta Display, Inc.?

10. Documents showing, on an annual basis since December 1, 2000, the price paid, including the unit price and net price after any discounts or rebates, for each model of LCD module purchased or received from:

- (a) AU Optronics Corporation?
- (b) Chi Mei Optoelectronics Corporation?
- (c) Quanta Display, Inc.?

11. Documents showing, on an annual basis since December 1, 2000, how many of each brand and model of LCD product you shipped and sold that used or could have used AUO modules from:

- (a) AU Optronics Corporation?
- (b) Chi Mei Optoelectronics Corporation?
- (c) Quanta Display, Inc.?

12. Documents showing, since December 1, 2000, the destination of each brand and model of LCD product you shipped and sold that used or could have used modules from:

- (a) AU Optronics Corporation?
- (b) Chi Mei Optoelectronics Corporation?
- (c) Quanta Display, Inc.?

13. Documents showing how many LCD modules your company has purchased from suppliers other than AU Optronics Corporation, Chi Mei Optoelectronics Corporation, or Quanta Display, Inc. on an annual basis since December 1, 2000.

14. Documents showing the percentage of LCD modules that your company has purchased from each of its suppliers on an annual basis since December 1, 2000.

15. Documents showing the identity of brands and customers that sell or sold in the United States LCD products made or sold by your company since December 1, 2000.

16. Documents showing the price at which your company sold each brand and model of LCD product to its customers that sell LCD products in the United States, for each year since December 1, 2000.

17. Documents showing the annual volume of sales made by your company to each customer that sells LCD products in the United States, including the quantity of each model sold or supplied to or for each customer, since December 1, 2000.

18. Documents showing the annual revenue generated from sales made by your company to brands and customers that sell LCD products in the United States, for each model of your products, since December 1, 2000.

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## EXHIBIT 4

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

LG DISPLAY CO., LTD.,

Plaintiff,

v.

CHI MEI OPTOELECTRONICS  
CORPORATION, et al.

Defendants.

Civil Action No. 06-726 (JJF)

Civil Action No. 07-357 (JJF)

**CONSOLIDATED CASES**

**LETTER OF REQUEST FOR INTERNATIONAL JUDICIAL ASSISTANCE  
FROM THE APPROPRIATE JUDICIAL AUTHORITY IN TAIPEI, TAIWAN**

TO THE APPROPRIATE JUDICIAL AUTHORITY OF TAIPEI, TAIWAN:

The United States District Court for the District of Delaware presents its compliments, and requests International Judicial Assistance to permit the Plaintiff in the above-captioned civil matter to take the deposition of and request the production of documents from the entities named herein.

This Court requests the assistance described herein as necessary in the interests of justice. The assistance requested is that the Appropriate Judicial Authority of Taipei, Taiwan compel the following entities to provide testimony upon oral examination relating to the questions in attached Schedule A and to provide the production of documents requested in attached Schedule B:

1. Acer Incorporated  
7F, 137, Sector 2  
Chien Kuo North Road  
Taipei 10479, Taiwan

2. Foxconn Technology Co., Ltd.  
No. 3-2 Chungshan Rd.  
Tucheng City, Taipei County 236, Taiwan
3. Hon Hai Precision Industry Co., Ltd.  
2 Tzu Yu Street  
Tu Cheng, Taiwan
4. Pro Arch Technology, Inc.  
8F1 China General Plastics Bldg 3 Tun Hua South Rd Section 1  
Sungshan Dist  
Taipei City, 105, Taiwan

Collectively, these companies are referred to herein as the “LCD Product Manufacturers”.

The above-captioned lawsuit is an action by Plaintiff LG Display Co., Ltd. (“LG Display”), a corporation existing under the laws of Korea, against Defendants that include AU Optronics Corporation (“AUO”) and Chi Mei Optoelectronics Corporation (“CMO”), both corporations existing under the laws of Taiwan. This Court properly has jurisdiction of all the parties and the subject matter of this action.

LG Display sued AUO and CMO for infringement of United States Patent Nos. 5,019,002 (the “‘002 patent”), 5,825,449 (the “‘449 patent”), 4,624,737 (the “‘737 patent”), 5,905,274 (the “‘274 patent”), 6,815,321 (the “‘321 patent”), 7,176,489 (the “‘489 patent”), 6,664,569 (the “‘569 patent”), 7,218,374 (the “‘374 patent”), and 6,803,984 (the “‘984 patent”) (collectively, “the Patents-in-Suit”), which cover various aspects of liquid crystal display (“LCD”) technology. LG Display alleges that AUO and CMO make and sell certain LCD modules that infringe the various claims of the Patents-in-Suit. LG Display also alleges that Quanta Display, Inc. (“QDI”) made and sold certain LCD modules that infringe the various claims of the Patents-in-Suit. QDI merged into AUO, and AUO is now responsible for any infringement by QDI products.

LG Display alleges that AUO and CMO manufacture infringing LCD modules in Taiwan, and that AUO and CMO sell and supply those allegedly infringing modules to LCD Product Manufacturers located in Taiwan and elsewhere for use in making LCD products such as televisions, laptop computers and computer monitors. The LCD Product Manufacturers sell and supply such display products containing the allegedly infringing AUO and CMO LCD modules to companies and brands that import and sell those products in the United States. LG Display believes that AUO and CMO sell modules directly to LCD Product Manufacturers and other customers. In addition, LG Display believes that AUO and CMO ship to LCD Product Manufacturers modules that AUO and CMO sell to customers whose LCD products are made or supplied by the LCD Product Manufacturers, using infringing AUO modules and CMO modules.

LG Display seeks information from the LCD Product Manufacturers regarding their use and purchase of AUO's, CMO's, and QDI's LCD products. Information sought by LG Display, for example, includes the quantities and model numbers of AUO, CMO, and QDI products purchased by the LCD Product Manufacturers, which brands and model numbers of finished LCD products use AUO's, CMO's, and QDI's products, and the sale and distribution of these products, including into and for the United States market. LG Display thus seeks to depose the LCD Product Manufacturers regarding the questions listed in the attached Schedule A. LG Display also seeks to obtain from the LCD Product Manufacturers the documents and things listed in the attached Schedule B.

By compelling the LCD Product Manufacturers to answer the questions listed in attached Schedule A and to produce the documents and things listed in attached Schedule B, the Appropriate Judicial Authority of Taiwan will allow LG Display to obtain necessary and material evidence for use at trial concerning issues including whether AUO and CMO induce

infringement of the Patents-in-Suit and the amount of damages that should be awarded to LG Display regarding any direct and/or indirect infringement.

It is requested that the witnesses be placed under oath before answering the questions. In the event that the witnesses cannot be placed under oath, it is requested that they answer questions in such manner as provided by local law for taking evidence.

It is also requested: a) that the responses of the witnesses be recorded by verbatim stenography or, if this is not possible, that LG Display is allowed to bring a court reporter to the examination of the witnesses in order to keep such verbatim minutes; b) that the witnesses sign the verbatim transcript or other record of their responses to the questions; and c) that the Court shall take all available measures to protect the confidentiality of the information obtained during the testimony.

It is further requested that the Court, if possible, request the witnesses to send the documents requested in Schedule B to LG Display's United States trial counsel at McKenna Long & Aldridge LLP, Attn: Cass W. Christenson, 1900 K Street NW, Washington, DC 20006, as soon as possible.

It is also requested, given the importance of the evidence to be obtained, that these Requests be given the highest consideration. To the extent that any of these Requests cannot be granted, the execution of these Requests shall be performed according to applicable law and the fact that some part or parts of this request can not be granted should not affect the execution of the remaining parts.

It is further requested that the parties' U.S. legal representatives identified above be informed as soon as practicable of the date and place where the examination is to take place. It is



further requested that, if possible, notice should be furnished to these legal representatives at least 15 days before the date set for the examination.

Any privilege to refuse to give evidence under United States law is contained in the United States Federal Rules of Civil Procedure ("FRCP"), Federal Rules of Evidence and other applicable United States laws. Specifically, the witness must answer all questions unless the witness is directed by counsel not to answer the question. Such an instruction is appropriate only when necessary to preserve a privilege, to enforce a limitation directed by the court, or to support a motion to cease testimony due to harassment of the witness. See FRCP 30(d)(1).

This Court respectfully requests that the Appropriate Judicial Authority in Taipei, Taiwan provide the foregoing judicial assistance. In addition, and in return for the favor of such judicial assistance by the Appropriate Judicial Authority in Taipei, Taiwan with respect to this matter, this Court offers its future assistance which may be hereafter required in the District of Delaware by the Appropriate Judicial Authority of Taipei, Taiwan.

Fees and costs incurred by the Taiwanese authorities executing this Letter of Request will be borne by Plaintiff LG Display. A check payable to the American Institute in Taiwan is enclosed to cover fees of the Appropriate Judicial Authority in Taipei, Taiwan.

Dated: June \_\_\_\_, 2008

Respectfully requested,

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The Honorable Joseph J. Farnan  
United States District Judge  
United States District Court for the  
District of Delaware  
J. Caleb Boggs Federal Bldg  
844 North King Street  
Wilmington, DE 19801-3519

**Judicial Seal:**

**SCHEDULE A**

**QUESTIONS TO BE ASKED THE WITNESSES AT DEPOSITION**

1. Did you have, or do you have, any strategic alliances with:

- (a) AU Optronics Corporation?
- (b) Chi Mei Optoelectronics Corporation?
- (c) Quanta Display, Inc.?

If so, please describe the nature of the alliance and when that alliance first began.

2. For each year since 2000, what percentage of your products use:

- (a) AU Optronics Corporation modules?
- (b) Chi Mei Optoelectronics Corporation modules?
- (c) Quanta Display, Inc. modules?

3. For each year since 2000, which of your models use which modules supplied by:

- (a) AU Optronics Corporation?
- (b) Chi Mei Optoelectronics Corporation?
- (c) Quanta Display, Inc.?

4. Are your products that use the modules from the following companies supplied in whole or part for the United States?

- (a) AU Optronics Corporation?
- (b) Chi Mei Optoelectronics Corporation?
- (c) Quanta Display, Inc.?

5. For each year since 2000, which of your customers purchased products using LCD modules from the following suppliers:

- (a) AU Optronics Corporation?
- (b) Chi Mei Optoelectronics Corporation?

(c) Quanta Display, Inc.?

6. For each year since 2000, did your products using LCD modules from the following companies comply with any requirements and regulations that apply to imports or sales in the United States:

(a) AU Optronics Corporation?

(b) Chi Mei Optoelectronics Corporation?

(c) Quanta Display, Inc.?

7. Which brands and models of LCD products did your company supply or manufacture for sale in the United States, in whole or in part, including the number of such units sold and the price per unit, each year since December 1, 2000?

8. What was the annual revenue received by your company from the sales of LCD products in each year from 2000 to 2007?

9. Since December 1, 2000, what models of LCD modules have you purchased and/or received from:

(a) AU Optronics Corporation?

(b) Chi Mei Optoelectronics Corporation?

(c) Quanta Display, Inc.?

10. Since December 1, 2000, which LCD modules manufactured or sold by the following companies were used in each of the different brands and models of products manufactured and sold by your company:

(a) AU Optronics Corporation?

(b) Chi Mei Optoelectronics Corporation?

(c) Quanta Display, Inc.?

11. For each product model made or sold by your company, how many of your products and units used?
  - (a) AU Optronics Corporation modules?
  - (b) Chi Mei Optoelectronics Corporation modules?
  - (c) Quanta Display, Inc. modules?
12. For each year since 2000, how many of each model of LCD module has your company purchased or received from:
  - (a) AU Optronics Corporation?
  - (b) Chi Mei Optoelectronics Corporation?
  - (c) Quanta Display, Inc.?
13. For each year since 2000, what was the price paid, including the unit price and net price after any discounts or rebates, for each model of LCD module purchased or received from:
  - (a) AU Optronics Corporation?
  - (b) Chi Mei Optoelectronics Corporation?
  - (c) Quanta Display, Inc.?
14. For each year since December 1, 2000, how many of each brand and model of LCD product you shipped and sold used or could have used modules from:
  - (a) AU Optronics Corporation?
  - (b) Chi Mei Optoelectronics Corporation?
  - (c) Quanta Display, Inc.?
15. For each year since December 1, 2000, what was the destination of each brand and model of LCD product you shipped and sold that used or could have used modules from:
  - (a) AU Optronics Corporation?
  - (b) Chi Mei Optoelectronics Corporation?

(c) Quanta Display, Inc.?

16. Identify each brand and customer that has imported and/or sold in the United States LCD products made or supplied by your company since December 1, 2000?

17. What price did your company sell each brand and model of LCD product to its customers that sell LCD products in the United States, for each year since December 1, 2000?

18. What was the annual volume of sales made by your company to each customer that sells LCD products in the United States, including the quantity of each model sold or supplied to or for each customer, each year since December 1, 2000?

19. What was the annual revenue generated from sales made by your company to brands and customers that sell LCD products in the United States, for each model of your products, each year since December 1, 2000?

**SCHEDULE B**

**LIST OF THE DOCUMENTS AND THINGS TO BE PRODUCED**

1. Documents showing the different models of LCD products sold by your company since December 1, 2000.
2. Documents showing the unit sales of each different brand and model of LCD product sold by your company since December 1, 2000, including the number of units sold and the price per unit.
3. Documents showing which brands and models of LCD products were manufactured for sale in the United States, in whole or in part, including the number of such units sold and the price per unit, each year since December 1, 2000.
4. Documents showing the annual revenue received by your company from the sales of LCD products from 2000 to 2007.
5. Documents showing the models of LCD modules purchased and/or received, since December 1, 2000 from:
  - (a) AU Optronics Corporation?
  - (b) Chi Mei Optoelectronics Corporation?
  - (c) Quanta Display, Inc.?
6. Documents showing which AU Optronics Corporation modules were used in each of the different brands and models of products manufactured and sold by your company since December 1, 2000, and the quantity of each AU Optronics Corporation module used for each product model made or sold by your company.
7. Documents showing which Chi Mei Optoelectronics Corporation modules were used in each of the different brands and models of products manufactured and sold by your

company since December 1, 2000, and the quantity of each Chi Mei Optoelectronics Corporation module used for each product model made or sold by your company.

8. Documents showing which Quanta Display, Inc. modules were used in each of the different brands and models of products manufactured and sold by your company since December 1, 2000, and the quantity of each Quanta Display, Inc. module used for each product model made or sold by your company.

9. Documents showing, since December 1, 2000 how many of each model of LCD module your company purchased or received, on an annual basis, from

- (a) AU Optronics Corporation?
- (b) Chi Mei Optoelectronics Corporation?
- (c) Quanta Display, Inc.?

10. Documents showing, on an annual basis since December 1, 2000, the price paid, including the unit price and net price after any discounts or rebates, for each model of LCD module purchased or received from:

- (a) AU Optronics Corporation?
- (b) Chi Mei Optoelectronics Corporation?
- (c) Quanta Display, Inc.?

11. Documents showing, on an annual basis since December 1, 2000, how many of each brand and model of LCD product you shipped and sold that used or could have used AUO modules from:

- (a) AU Optronics Corporation?
- (b) Chi Mei Optoelectronics Corporation?
- (c) Quanta Display, Inc.?



12. Documents showing, since December 1, 2000, the destination of each brand and model of LCD product you shipped and sold that used or could have used modules from:

- (a) AU Optronics Corporation?
- (b) Chi Mei Optoelectronics Corporation?
- (c) Quanta Display, Inc.?

13. Documents showing how many LCD modules your company has purchased from suppliers other than AU Optronics Corporation, Chi Mei Optoelectronics Corporation, or Quanta Display, Inc. on an annual basis since December 1, 2000.

14. Documents showing the percentage of LCD modules that your company has purchased from each of its suppliers on an annual basis since December 1, 2000.

15. Documents showing the identity of brands and customers that sell or sold in the United States LCD products made or sold by your company since December 1, 2000.

16. Documents showing the price at which your company sold each brand and model of LCD product to its customers that sell LCD products in the United States, for each year since December 1, 2000.

17. Documents showing the annual volume of sales made by your company to each customer that sells LCD products in the United States, including the quantity of each model sold or supplied to or for each customer, since December 1, 2000.

18. Documents showing the annual revenue generated from sales made by your company to brands and customers that sell LCD products in the United States, for each model of your products, since December 1, 2000.

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## EXHIBIT 5

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

LG DISPLAY CO., LTD.,

Plaintiff,

v.

CHI MEI OPTOELECTRONICS  
CORPORATION, et al.

Defendants.

Civil Action No. 06-726 (JJF)

Civil Action No. 07-357 (JJF)

**CONSOLIDATED CASES**

**LETTER OF REQUEST FOR INTERNATIONAL JUDICIAL ASSISTANCE  
FROM THE APPROPRIATE JUDICIAL AUTHORITY IN JAPAN**

TO THE APPROPRIATE JUDICIAL AUTHORITY OF JAPAN:

The United States District Court for the District of Delaware presents its compliments, and requests International Judicial Assistance to permit the Plaintiff in the above-captioned civil matter to take the deposition of and request the production of documents from the entities named herein.

This Court requests the assistance described herein as necessary in the interests of justice. The assistance requested is that the Appropriate Judicial Authority of Japan compel the following entities to provide testimony upon oral examination relating to the questions in attached Schedule A and to provide the production of documents requested in attached Schedule B:

1. Funai Electric Co., Ltd.  
7-7-1 Nakagaito  
Daito, 574-0013  
Japan

2. Sharp Corporation  
8 Ichigayahachiman-cho  
Shinjyuku-ku, 162-0844  
Japan
3. Sony Corporation  
1-7-1 Minato-Minami  
Minato-ku, 108-0075  
Japan
4. Toshiba Corporation  
1-1-1 Shibaura  
Minato-ku, 105-8001  
Japan

Collectively, these companies are referred to herein as the “LCD Product Manufacturers”.

The above-captioned lawsuit is an action by Plaintiff LG Display Co., Ltd. (“LG Display”), a corporation existing under the laws of Korea, against Defendants that include AU Optronics Corporation (“AUO”) and Chi Mei Optoelectronics Corporation (“CMO”), both corporations existing under the laws of Taiwan. This Court properly has jurisdiction of all the parties and the subject matter of this action.

LG Display sued AUO and CMO for infringement of United States Patent Nos. 5,019,002 (the “‘002 patent”), 5,825,449 (the “‘449 patent”), 4,624,737 (the “‘737 patent”), 5,905,274 (the “‘274 patent”), 6,815,321 (the “‘321 patent”), 7,176,489 (the “‘489 patent”), 6,664,569 (the “‘569 patent”), 7,218,374 (the “‘374 patent”), and 6,803,984 (the “‘984 patent”) (collectively, “the Patents-in-Suit”), which cover various aspects of liquid crystal display (“LCD”) technology. LG Display alleges that AUO and CMO make and sell certain LCD modules that infringe the various claims of the Patents-in-Suit. LG Display also alleges that Quanta Display, Inc. (“QDI”) made and sold certain LCD modules that infringe the various

claims of the Patents-in-Suit. QDI merged into AUO, and AUO is now responsible for any infringement by QDI products.

LG Display alleges that AUO and CMO manufacture infringing LCD modules in Taiwan, and that AUO and CMO sell and supply those allegedly infringing modules to LCD Product Manufacturers located in Japan and elsewhere for use in making LCD products such as televisions, laptop computers and computer monitors. The LCD Product Manufacturers sell and supply such display products containing the allegedly infringing AUO and CMO LCD modules to companies and brands that import and sell those products in the United States. LG Display believes that AUO and CMO sell modules directly to LCD Product Manufacturers and other customers. In addition, LG Display believes that AUO and CMO ship to LCD Product Manufacturers modules that AUO and CMO sell to customers whose LCD products are made or supplied by the LCD Product Manufacturers, using infringing AUO modules and CMO modules.

LG Display seeks information from the LCD Product Manufacturers regarding their use and purchase of AUO's, CMO's, and QDI's LCD products. Information sought by LG Display, for example, includes the quantities and model numbers of AUO, CMO, and QDI products purchased by the LCD Product Manufacturers, which brands and model numbers of finished LCD products use AUO's, CMO's, and QDI's products, and the sale and distribution of these products, including into and for the United States market. LG Display thus seeks to depose the LCD Product Manufacturers regarding the questions listed in the attached Schedule A. LG Display also seeks to obtain from the LCD Product Manufacturers the documents and things listed in the attached Schedule B.

By compelling the LCD Product Manufacturers to answer the questions listed in attached Schedule A and to produce the documents and things listed in attached Schedule B, the

Appropriate Judicial Authority of Japan will allow LG Display to obtain necessary and material evidence for use at trial concerning issues including whether AUO and CMO induce infringement of the Patents-in-Suit and the amount of damages that should be awarded to LG Display regarding any direct and/or indirect infringement.

It is requested that the witnesses be placed under oath before answering the questions. In the event that the witnesses cannot be placed under oath, it is requested that they answer questions in such manner as provided by local law for taking evidence.

It is also requested: a) that the responses of the witnesses be recorded by verbatim stenography or, if this is not possible, that LG Display is allowed to bring a court reporter to the examination of the witnesses in order to keep such verbatim minutes; b) that the witnesses sign the verbatim transcript or other record of their responses to the questions; and c) that the Court shall take all available measures to protect the confidentiality of the information obtained during the testimony.

It is further requested that the Court, if possible, request the witnesses to send the documents requested in Schedule B to LG Display's United States trial counsel at McKenna Long & Aldridge LLP, Attn: Cass W. Christenson, 1900 K Street NW, Washington, DC 20006, as soon as possible.

It is also requested, given the importance of the evidence to be obtained, that these Requests be given the highest consideration. To the extent that any of these Requests cannot be granted, the execution of these Requests shall be performed according to applicable law and the fact that some part or parts of this request can not be granted should not affect the execution of the remaining parts.

It is further requested that the parties' U.S. legal representatives identified above be informed as soon as practicable of the date and place where the examination is to take place. It is further requested that, if possible, notice should be furnished to these legal representatives at least 15 days before the date set for the examination.

Any privilege to refuse to give evidence under United States law is contained in the United States Federal Rules of Civil Procedure ("FRCP"), Federal Rules of Evidence and other applicable United States laws. Specifically, the witness must answer all questions unless the witness is directed by counsel not to answer the question. Such an instruction is appropriate only when necessary to preserve a privilege, to enforce a limitation directed by the court, or to support a motion to cease testimony due to harassment of the witness. See FRCP 30(d)(1).

This Court respectfully requests that the Appropriate Judicial Authority in Japan provide the foregoing judicial assistance. In addition, and in return for the favor of such judicial assistance by the Appropriate Judicial Authority in Japan with respect to this matter, this Court offers its future assistance which may be hereafter required in the District of Delaware by the Appropriate Judicial Authority of Japan.

Fees and costs incurred by the Japanese authorities executing this Letter of Request will be borne by Plaintiff LG Display. A check is enclosed to cover fees of the Appropriate Judicial Authority in Japan. Dated: June \_\_\_\_, 2008

Respectfully requested,

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The Honorable Joseph J. Farnan  
United States District Judge  
United States District Court for the  
District of Delaware  
J. Caleb Boggs Federal Bldg

844 North King Street  
Wilmington, DE 19801-3519

**Judicial Seal:**



**SCHEDULE A**

**QUESTIONS TO BE ASKED THE WITNESSES AT DEPOSITION**

1. Did you have, or do you have, any strategic alliances with:

- (a) AU Optronics Corporation?
- (b) Chi Mei Optoelectronics Corporation?
- (c) Quanta Display, Inc.?

If so, please describe the nature of the alliance and when that alliance first began.

2. For each year since 2000, what percentage of your products use:

- (a) AU Optronics Corporation modules?
- (b) Chi Mei Optoelectronics Corporation modules?
- (c) Quanta Display, Inc. modules?

3. For each year since 2000, which of your models use which modules supplied by:

- (a) AU Optronics Corporation?
- (b) Chi Mei Optoelectronics Corporation?
- (c) Quanta Display, Inc.?

4. Are your products that use the modules from the following companies supplied in whole or part for the United States?

- (a) AU Optronics Corporation?
- (b) Chi Mei Optoelectronics Corporation?
- (c) Quanta Display, Inc.?

5. For each year since 2000, which of your customers purchased products using LCD modules from the following suppliers:

- (a) AU Optronics Corporation?
- (b) Chi Mei Optoelectronics Corporation?

(c) Quanta Display, Inc.?

6. For each year since 2000, did your products using LCD modules from the following companies comply with any requirements and regulations that apply to imports or sales in the United States:

(a) AU Optronics Corporation?

(b) Chi Mei Optoelectronics Corporation?

(c) Quanta Display, Inc.?

7. Which brands and models of LCD products did your company supply or manufacture for sale in the United States, in whole or in part, including the number of such units sold and the price per unit, each year since December 1, 2000?

8. What was the annual revenue received by your company from the sales of LCD products in each year from 2000 to 2007?

9. Since December 1, 2000, what models of LCD modules have you purchased and/or received from:

(a) AU Optronics Corporation?

(b) Chi Mei Optoelectronics Corporation?

(c) Quanta Display, Inc.?

10. Since December 1, 2000, which LCD modules manufactured or sold by the following companies were used in each of the different brands and models of products manufactured and sold by your company:

(a) AU Optronics Corporation?

(b) Chi Mei Optoelectronics Corporation?

(c) Quanta Display, Inc.?

11. For each product model made or sold by your company, how many of your products and units used?

- (a) AU Optronics Corporation modules?
- (b) Chi Mei Optoelectronics Corporation modules?
- (c) Quanta Display, Inc. modules?

12. For each year since 2000, how many of each model of LCD module has your company purchased or received from:

- (a) AU Optronics Corporation?
- (b) Chi Mei Optoelectronics Corporation?
- (c) Quanta Display, Inc.?

13. For each year since 2000, what was the price paid, including the unit price and net price after any discounts or rebates, for each model of LCD module purchased or received from:

- (a) AU Optronics Corporation?
- (b) Chi Mei Optoelectronics Corporation?
- (c) Quanta Display, Inc.?

14. For each year since December 1, 2000, how many of each brand and model of LCD product you shipped and sold used or could have used modules from:

- (a) AU Optronics Corporation?
- (b) Chi Mei Optoelectronics Corporation?
- (c) Quanta Display, Inc.?

15. For each year since December 1, 2000, what was the destination of each brand and model of LCD product you shipped and sold that used or could have used modules from:

- (a) AU Optronics Corporation?
- (b) Chi Mei Optoelectronics Corporation?

(c) Quanta Display, Inc.?

16. Identify each brand and customer that has imported and/or sold in the United States LCD products made or supplied by your company since December 1, 2000?

17. What price did your company sell each brand and model of LCD product to its customers that sell LCD products in the United States, for each year since December 1, 2000?

18. What was the annual volume of sales made by your company to each customer that sells LCD products in the United States, including the quantity of each model sold or supplied to or for each customer, each year since December 1, 2000?

19. What was the annual revenue generated from sales made by your company to brands and customers that sell LCD products in the United States, for each model of your products, each year since December 1, 2000?

## **SCHEDULE B**

### **LIST OF THE DOCUMENTS AND THINGS TO BE PRODUCED**

1. Documents showing the different models of LCD products sold by your company since December 1, 2000.
2. Documents showing the unit sales of each different brand and model of LCD product sold by your company since December 1, 2000, including the number of units sold and the price per unit.
3. Documents showing which brands and models of LCD products were manufactured for sale in the United States, in whole or in part, including the number of such units sold and the price per unit, each year since December 1, 2000.
4. Documents showing the annual revenue received by your company from the sales of LCD products from 2000 to 2007.
5. Documents showing the models of LCD modules purchased and/or received, since December 1, 2000 from:
  - (a) AU Optronics Corporation?
  - (b) Chi Mei Optoelectronics Corporation?
  - (c) Quanta Display, Inc.?
6. Documents showing which AU Optronics Corporation modules were used in each of the different brands and models of products manufactured and sold by your company since December 1, 2000, and the quantity of each AU Optronics Corporation module used for each product model made or sold by your company.
7. Documents showing which Chi Mei Optoelectronics Corporation modules were used in each of the different brands and models of products manufactured and sold by your

company since December 1, 2000, and the quantity of each Chi Mei Optoelectronics Corporation module used for each product model made or sold by your company.

8. Documents showing which Quanta Display, Inc. modules were used in each of the different brands and models of products manufactured and sold by your company since December 1, 2000, and the quantity of each Quanta Display, Inc. module used for each product model made or sold by your company.

9. Documents showing, since December 1, 2000 how many of each model of LCD module your company purchased or received, on an annual basis, from

- (a) AU Optronics Corporation?
- (b) Chi Mei Optoelectronics Corporation?
- (c) Quanta Display, Inc.?

10. Documents showing, on an annual basis since December 1, 2000, the price paid, including the unit price and net price after any discounts or rebates, for each model of LCD module purchased or received from:

- (a) AU Optronics Corporation?
- (b) Chi Mei Optoelectronics Corporation?
- (c) Quanta Display, Inc.?

11. Documents showing, on an annual basis since December 1, 2000, how many of each brand and model of LCD product you shipped and sold that used or could have used AUO modules from:

- (a) AU Optronics Corporation?
- (b) Chi Mei Optoelectronics Corporation?
- (c) Quanta Display, Inc.?

12. Documents showing, since December 1, 2000, the destination of each brand and model of LCD product you shipped and sold that used or could have used modules from:

- (a) AU Optronics Corporation?
- (b) Chi Mei Optoelectronics Corporation?
- (c) Quanta Display, Inc.?

13. Documents showing how many LCD modules your company has purchased from suppliers other than AU Optronics Corporation, Chi Mei Optoelectronics Corporation, or Quanta Display, Inc. on an annual basis since December 1, 2000.

14. Documents showing the percentage of LCD modules that your company has purchased from each of its suppliers on an annual basis since December 1, 2000.

15. Documents showing the identity of brands and customers that sell or sold in the United States LCD products made or sold by your company since December 1, 2000.

16. Documents showing the price at which your company sold each brand and model of LCD product to its customers that sell LCD products in the United States, for each year since December 1, 2000.

17. Documents showing the annual volume of sales made by your company to each customer that sells LCD products in the United States, including the quantity of each model sold or supplied to or for each customer, since December 1, 2000.

18. Documents showing the annual revenue generated from sales made by your company to brands and customers that sell LCD products in the United States, for each model of your products, since December 1, 2000.

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## EXHIBIT 6



**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

LG DISPLAY CO., LTD.,

Plaintiff,

v.

CHI MEI OPTOELECTRONICS  
CORPORATION, et al.

Defendants.

Civil Action No. 06-726 (JJF)

Civil Action No. 07-357 (JJF)

**CONSOLIDATED CASES**

**LETTER OF REQUEST FOR INTERNATIONAL JUDICIAL ASSISTANCE  
FROM THE APPROPRIATE JUDICIAL AUTHORITY IN CHINA**

TO THE APPROPRIATE JUDICIAL AUTHORITY OF CHINA:

The United States District Court for the District of Delaware presents its compliments, and requests International Judicial Assistance to permit the Plaintiff in the above-captioned civil matter to take the deposition of and request the production of documents from the entities named herein.

This Court requests the assistance described herein as necessary in the interests of justice. The assistance requested is that the Appropriate Judicial Authority of China compel the following entities to provide testimony upon oral examination relating to the questions in attached Schedule A and to provide the production of documents requested in attached Schedule B:

1. Delta Electronics (Dongguan) Co., Ltd.  
Delta Industrial Estate  
ShiJie Town, DongGuan City  
GuangDong Province, China 523308

2. Provview Technology Co. (Shenzhen), Ltd.  
North Block 21, 23#  
Shataukok Free Trade Zone  
Shen Zhen, China
3. Top Victory Electronics (Fujian) Co., Ltd.  
Shang-zheng, Yuan Hong Rd.  
Fuqing, 350301, Fujian, China

Collectively, these companies are referred to herein as the “LCD Product Manufacturers”.

The above-captioned lawsuit is an action by Plaintiff LG Display Co., Ltd. (“LG Display”), a corporation existing under the laws of Korea, against Defendants that include AU Optronics Corporation (“AUO”) and Chi Mei Optoelectronics Corporation (“CMO”), both corporations existing under the laws of Taiwan. This Court properly has jurisdiction of all the parties and the subject matter of this action.

LG Display sued AUO and CMO for infringement of United States Patent Nos. 5,019,002 (the “‘002 patent”), 5,825,449 (the “‘449 patent”), 4,624,737 (the “‘737 patent”), 5,905,274 (the “‘274 patent”), 6,815,321 (the “‘321 patent”), 7,176,489 (the “‘489 patent”), 6,664,569 (the “‘569 patent”), 7,218,374 (the “‘374 patent”), and 6,803,984 (the “‘984 patent”) (collectively, “the Patents-in-Suit”), which cover various aspects of liquid crystal display (“LCD”) technology. LG Display alleges that AUO and CMO make and sell certain LCD modules that infringe the various claims of the Patents-in-Suit. LG Display also alleges that Quanta Display, Inc. (“QDI”) made and sold certain LCD modules that infringe the various claims of the Patents-in-Suit. QDI merged into AUO, and AUO is now responsible for any infringement by QDI products.

LG Display alleges that AUO and CMO manufacture infringing LCD modules in Taiwan, and that AUO and CMO sell and supply those allegedly infringing modules to LCD

Product Manufacturers located in China and elsewhere for use in making LCD products such as televisions, laptop computers and computer monitors. The LCD Product Manufacturers sell and supply such display products containing the allegedly infringing AUO and CMO LCD modules to companies and brands that import and sell those products in the United States. LG Display believes that AUO and CMO sell modules directly to LCD Product Manufacturers and other customers. In addition, LG Display believes that AUO and CMO ship to LCD Product Manufacturers modules that AUO and CMO sell to customers whose LCD products are made or supplied by the LCD Product Manufacturers, using infringing AUO modules and CMO modules.

LG Display seeks information from the LCD Product Manufacturers regarding their use and purchase of AUO's, CMO's, and QDI's LCD products. Information sought by LG Display, for example, includes the quantities and model numbers of AUO, CMO, and QDI products purchased by the LCD Product Manufacturers, which brands and model numbers of finished LCD products use AUO's, CMO's, and QDI's products, and the sale and distribution of these products, including into and for the United States market. LG Display thus seeks to depose the LCD Product Manufacturers regarding the questions listed in the attached Schedule A. LG Display also seeks to obtain from the LCD Product Manufacturers the documents and things listed in the attached Schedule B.

By compelling the LCD Product Manufacturers to answer the questions listed in attached Schedule A and to produce the documents and things listed in attached Schedule B, the Appropriate Judicial Authority of China will allow LG Display to obtain necessary and material evidence for use at trial concerning issues including whether AUO and CMO induce infringement of the Patents-in-Suit and the amount of damages that should be awarded to LG Display regarding any direct and/or indirect infringement.

It is requested that the witnesses be placed under oath before answering the questions. In the event that the witnesses cannot be placed under oath, it is requested that they answer questions in such manner as provided by local law for taking evidence.

It is also requested: a) that the responses of the witnesses be recorded by verbatim stenography or, if this is not possible, that LG Display is allowed to bring a court reporter to the examination of the witnesses in order to keep such verbatim minutes; b) that the witnesses sign the verbatim transcript or other record of their responses to the questions; and c) that the Court shall take all available measures to protect the confidentiality of the information obtained during the testimony.

It is further requested that the Court, if possible, request the witnesses to send the documents requested in Schedule B to LG Display's United States trial counsel at McKenna Long & Aldridge LLP, Attn: Cass W. Christenson, 1900 K Street NW, Washington, DC 20006, as soon as possible.

It is also requested, given the importance of the evidence to be obtained, that these Requests be given the highest consideration. To the extent that any of these Requests cannot be granted, the execution of these Requests shall be performed according to applicable law and the fact that some part or parts of this request can not be granted should not affect the execution of the remaining parts.

It is further requested that the parties' U.S. legal representatives identified above be informed as soon as practicable of the date and place where the examination is to take place. It is further requested that, if possible, notice should be furnished to these legal representatives at least 15 days before the date set for the examination.

Any privilege to refuse to give evidence under United States law is contained in the United States Federal Rules of Civil Procedure ("FRCP"), Federal Rules of Evidence and other applicable United States laws. Specifically, the witness must answer all questions unless the witness is directed by counsel not to answer the question. Such an instruction is appropriate only when necessary to preserve a privilege, to enforce a limitation directed by the court, or to support a motion to cease testimony due to harassment of the witness. See FRCP 30(d)(1).

This Court respectfully requests that the Appropriate Judicial Authority in China provide the foregoing judicial assistance. In addition, and in return for the favor of such judicial assistance by the Appropriate Judicial Authority in China with respect to this matter, this Court offers its future assistance which may be hereafter required in the District of Delaware by the Appropriate Judicial Authority of China.

Fees and costs incurred by the Chinese authorities executing this Letter of Request will be borne by Plaintiff LG Display. A check is enclosed to cover fees of the Appropriate Judicial Authority in China. Dated: June \_\_\_\_, 2008

Respectfully requested,

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The Honorable Joseph J. Farnan  
United States District Judge  
United States District Court for the  
District of Delaware  
J. Caleb Boggs Federal Bldg  
844 North King Street  
Wilmington, DE 19801-3519

**Judicial Seal:**

**SCHEDULE A**

**QUESTIONS TO BE ASKED THE WITNESSES AT DEPOSITION**

1. Did you have, or do you have, any strategic alliances with:
  - (a) AU Optronics Corporation?
  - (b) Chi Mei Optoelectronics Corporation?
  - (c) Quanta Display, Inc.?If so, please describe the nature of the alliance and when that alliance first began.
2. For each year since 2000, what percentage of your products use:
  - (a) AU Optronics Corporation modules?
  - (b) Chi Mei Optoelectronics Corporation modules?
  - (c) Quanta Display, Inc. modules?
3. For each year since 2000, which of your models use which modules supplied by:
  - (a) AU Optronics Corporation?
  - (b) Chi Mei Optoelectronics Corporation?
  - (c) Quanta Display, Inc.?
4. Are your products that use the modules from the following companies supplied in whole or part for the United States?
  - (a) AU Optronics Corporation?
  - (b) Chi Mei Optoelectronics Corporation?
  - (c) Quanta Display, Inc.?
5. For each year since 2000, which of your customers purchased products using LCD modules from the following suppliers:
  - (a) AU Optronics Corporation?
  - (b) Chi Mei Optoelectronics Corporation?

(c) Quanta Display, Inc.?

6. For each year since 2000, did your products using LCD modules from the following companies comply with any requirements and regulations that apply to imports or sales in the United States:

(a) AU Optronics Corporation?

(b) Chi Mei Optoelectronics Corporation?

(c) Quanta Display, Inc.?

7. Which brands and models of LCD products did your company supply or manufacture for sale in the United States, in whole or in part, including the number of such units sold and the price per unit, each year since December 1, 2000?

8. What was the annual revenue received by your company from the sales of LCD products in each year from 2000 to 2007?

9. Since December 1, 2000, what models of LCD modules have you purchased and/or received from:

(a) AU Optronics Corporation?

(b) Chi Mei Optoelectronics Corporation?

(c) Quanta Display, Inc.?

10. Since December 1, 2000, which LCD modules manufactured or sold by the following companies were used in each of the different brands and models of products manufactured and sold by your company:

(a) AU Optronics Corporation?

(b) Chi Mei Optoelectronics Corporation?

(c) Quanta Display, Inc.?

11. For each product model made or sold by your company, how many of your products and units used?
- (a) AU Optronics Corporation modules?
  - (b) Chi Mei Optoelectronics Corporation modules?
  - (c) Quanta Display, Inc. modules?
12. For each year since 2000, how many of each model of LCD module has your company purchased or received from:
- (a) AU Optronics Corporation?
  - (b) Chi Mei Optoelectronics Corporation?
  - (c) Quanta Display, Inc.?
13. For each year since 2000, what was the price paid, including the unit price and net price after any discounts or rebates, for each model of LCD module purchased or received from:
- (a) AU Optronics Corporation?
  - (b) Chi Mei Optoelectronics Corporation?
  - (c) Quanta Display, Inc.?
14. For each year since December 1, 2000, how many of each brand and model of LCD product you shipped and sold used or could have used modules from:
- (a) AU Optronics Corporation?
  - (b) Chi Mei Optoelectronics Corporation?
  - (c) Quanta Display, Inc.?
15. For each year since December 1, 2000, what was the destination of each brand and model of LCD product you shipped and sold that used or could have used modules from:
- (a) AU Optronics Corporation?
  - (b) Chi Mei Optoelectronics Corporation?



(c) Quanta Display, Inc.?

16. Identify each brand and customer that has imported and/or sold in the United States LCD products made or supplied by your company since December 1, 2000?

17. What price did your company sell each brand and model of LCD product to its customers that sell LCD products in the United States, for each year since December 1, 2000?

18. What was the annual volume of sales made by your company to each customer that sells LCD products in the United States, including the quantity of each model sold or supplied to or for each customer, each year since December 1, 2000?

19. What was the annual revenue generated from sales made by your company to brands and customers that sell LCD products in the United States, for each model of your products, each year since December 1, 2000?

**SCHEDULE B**

**LIST OF THE DOCUMENTS AND THINGS TO BE PRODUCED**

1. Documents showing the different models of LCD products sold by your company since December 1, 2000.
2. Documents showing the unit sales of each different brand and model of LCD product sold by your company since December 1, 2000, including the number of units sold and the price per unit.
3. Documents showing which brands and models of LCD products were manufactured for sale in the United States, in whole or in part, including the number of such units sold and the price per unit, each year since December 1, 2000.
4. Documents showing the annual revenue received by your company from the sales of LCD products from 2000 to 2007.
5. Documents showing the models of LCD modules purchased and/or received, since December 1, 2000 from:
  - (a) AU Optronics Corporation?
  - (b) Chi Mei Optoelectronics Corporation?
  - (c) Quanta Display, Inc.?
6. Documents showing which AU Optronics Corporation modules were used in each of the different brands and models of products manufactured and sold by your company since December 1, 2000, and the quantity of each AU Optronics Corporation module used for each product model made or sold by your company.
7. Documents showing which Chi Mei Optoelectronics Corporation modules were used in each of the different brands and models of products manufactured and sold by your

company since December 1, 2000, and the quantity of each Chi Mei Optoelectronics Corporation module used for each product model made or sold by your company.

8. Documents showing which Quanta Display, Inc. modules were used in each of the different brands and models of products manufactured and sold by your company since December 1, 2000, and the quantity of each Quanta Display, Inc. module used for each product model made or sold by your company.

9. Documents showing, since December 1, 2000 how many of each model of LCD module your company purchased or received, on an annual basis, from

- (a) AU Optronics Corporation?
- (b) Chi Mei Optoelectronics Corporation?
- (c) Quanta Display, Inc.?

10. Documents showing, on an annual basis since December 1, 2000, the price paid, including the unit price and net price after any discounts or rebates, for each model of LCD module purchased or received from:

- (a) AU Optronics Corporation?
- (b) Chi Mei Optoelectronics Corporation?
- (c) Quanta Display, Inc.?

11. Documents showing, on an annual basis since December 1, 2000, how many of each brand and model of LCD product you shipped and sold that used or could have used AUO modules from:

- (a) AU Optronics Corporation?
- (b) Chi Mei Optoelectronics Corporation?
- (c) Quanta Display, Inc.?

12. Documents showing, since December 1, 2000, the destination of each brand and model of LCD product you shipped and sold that used or could have used modules from:

- (a) AU Optronics Corporation?
- (b) Chi Mei Optoelectronics Corporation?
- (c) Quanta Display, Inc.?

13. Documents showing how many LCD modules your company has purchased from suppliers other than AU Optronics Corporation, Chi Mei Optoelectronics Corporation, or Quanta Display, Inc. on an annual basis since December 1, 2000.

14. Documents showing the percentage of LCD modules that your company has purchased from each of its suppliers on an annual basis since December 1, 2000.

15. Documents showing the identity of brands and customers that sell or sold in the United States LCD products made or sold by your company since December 1, 2000.

16. Documents showing the price at which your company sold each brand and model of LCD product to its customers that sell LCD products in the United States, for each year since December 1, 2000.

17. Documents showing the annual volume of sales made by your company to each customer that sells LCD products in the United States, including the quantity of each model sold or supplied to or for each customer, since December 1, 2000.

18. Documents showing the annual revenue generated from sales made by your company to brands and customers that sell LCD products in the United States, for each model of your products, since December 1, 2000.

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**CERTIFICATE OF SERVICE**

The undersigned counsel certifies that, on June 11, 2008, he served the foregoing documents by email and by hand upon the following counsel:

Philip A. Rovner  
David E. Moore  
POTTER ANDERSON & CORROON LLP  
1313 North Market Street  
Wilmington, DE 19899-0951

Karen L. Pascale  
John W. Shaw  
YOUNG CONAWAY STARGATT &  
TAYLOR, LLP  
The Brandywine Building  
1000 West Street, 17th Floor  
Wilmington, DE 19899-0391

The undersigned counsel further certifies that, on June 11, 2008, he served the foregoing documents by email and by U.S. Mail upon the following counsel:

Jonathan S. Kagan  
IRELL & MANELLA LLP  
1800 Avenue of the Stars  
Suite 900  
Los Angeles, CA 90067

Vincent K. Yip  
Peter J. Wied  
PAUL, HASTINGS, JANOFSKY &  
WALKER LLP  
515 South Flower Street, 25<sup>th</sup> Floor  
Los Angeles, CA 90071

Ron E. Shulman, Esquire  
Julie Holloway, Esquire  
WILSON SONSINI GOODRICH & ROSATI  
650 Page Mill Road  
Palo Alto, California 94304-1050

M. Craig Tyler, Esquire  
Brian D. Range, Esquire  
WILSON SONSINI GOODRICH & ROSATI  
8911 Capital of Texas Highway North  
Westech 360, Suite 3350  
Austin, Texas 78759-8497

/s/ Richard D. Kirk, (rk0922)  
Richard D. Kirk